



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

SEATTLE, WASHINGTON 98101

April 12, 1988



REPLY TO
ATTN OF: MD-101

MEMORANDUM

SUBJECT: Health and Safety Report - Bunker Hill Superfund Site

FROM: Dede Montgomery *Dede*
Industrial Hygienist

TO: Sally Martyn
Site Manager

As you know, I visited the Bunker Hill Site on April 7-8, 1988. The purpose of this memo is to address comments that I have related to onsite personnel health and safety. These comments relate to: 1) onsite salvage operations; 2) abandoned building entry; and 3) asbestos-containing material.

Due to the fact that there were no salvagers at the Site during our visit, it is impossible for me to evaluate their safety practices. It is obvious that there are some serious safety hazards inside and near some of the buildings, particularly those that have been partially demolished. There were several buildings that the Owners would not allow us (EPA) to enter due to safety hazards. I understand that Bill Freutel is assisting you in developing a strategy for the remainder of the facility salvaging. I believe that it is the responsibility of each Salvage Contractor to notify its employees about work-related health and safety hazards and to implement procedures to minimize such hazards (29 CFR 1926.20). It appears to me that it would be in the Owner's best interest to adhere to some type of a salvage plan that will limit the precariousness of the salvaging operation. (An example of such a plan could include complete demolition of buildings prior to the salvage of materials.) Although OSHA could certainly issue additional citations to Contractors if health and safety violations are committed, you know better than I what restrictions EPA can place on the Owner regarding salvaging.

With good weather approaching, and the expected increase in salvage activity, entrance into any of the abandoned facility buildings by EPA Personnel or Contractors should be avoided. Obviously, some buildings are in worse shape structurally than others, and contamination with heavy metals and asbestos is more prevalent and severe in certain buildings. If entry is required, respiratory protection and protective clothing should be worn inside the buildings, as well as outside if any activities are releasing dust into the breathing zone. Due to the toxicity of the hazardous materials, especially asbestos, full facepiece air-purifying respirators (with HEPA filters) are warranted. I understand the concern about lack of visibility with the full facepieces in the darkened buildings. However, I didn't notice this to be a significant problem inside all of the buildings that I entered. Personnel need to be reminded to slow down and exert caution, but I question whether

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they should be entering any of the facilities if visibility is that poor. This is a decision that needs to be made on a case-by-case basis, utilizing information on entry objectives. We should discuss this topic further if it is part of the workplan for EPA Personnel or Contractors to enter onsite buildings, so to create some workable procedures.

Any further removal or demolition of asbestos-containing material must be accompanied by additional health and safety precautions. For your information, I am including a copy of The OSHA Asbestos Standard for Construction Industry (1926.58). This Standard outlines some of the procedures that need to be followed during a proper removal operation (such as respiratory protection, "regulated area", decontamination, etc.). We can discuss this at greater length if and when it becomes appropriate. I performed asbestos personal air sampling for our inspectors during my site visit, and I will provide the analytical results to you as soon as I receive them.

Please feel free to contact me if you have any questions or comments on any health and safety-related matter.

cc: Ron Blair
Nora McGee